

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Mark D. Schaeffer aka Mark Douglas Schaeffer aka Mark Schaeffer Danielle Christa Schaeffer aka Danielle C. Schaeffer aka Danielle Schaeffer Debtor(s) WELLS FARGO BANK, N.A. Movant v. Mark D. Schaeffer aka Mark Douglas Schaeffer aka Mark Schaeffer Danielle Christa Schaeffer aka Danielle C. Schaeffer aka Danielle Schaeffer and Frederick L. Reigle, Esquire Respondents	18-10620 REF Chapter 13 Proceeding Hearing Date: 04/05/2018 at 9:30am
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**CERTIFICATE OF NO RESPONSE
TO MOTION FOR RELIEF**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on March 14, 2018 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **03/29/2018**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,
POWERS KIRN & ASSOCIATES, LLC

By: **/s/ Jill Manuel-Coughlin, Esquire**
By: Jill Manuel-Coughlin
Attorney ID # 63252
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053
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Attorney for Movant
DATED: March 30, 2018

17-1217

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IN RE: Mark D. Schaeffer aka Mark Douglas Schaeffer aka Mark Schaeffer Danielle Christa Schaeffer aka Danielle C. Schaeffer aka Danielle Schaeffer Debtor(s) WELLS FARGO BANK, N.A. Movant v. Mark D. Schaeffer aka Mark Douglas Schaeffer aka Mark Schaeffer Danielle Christa Schaeffer aka Danielle C. Schaeffer aka Danielle Schaeffer and Frederick L. Reigle, Esquire Respondents	18-10620 REF Chapter 13 Proceeding Hearing Date: 04/05/2018 at 9:30am
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CERTIFICATION OF SERVICE AND NOTICE

JILL MANUEL-COUGHLIN, counsel for WELLS FARGO BANK, N.A., hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on March 30, 2018:

Served Electronically:

J. Zac Christman, Esquire
712 Monroe Street
P.O. Box 511
Stroudsburg, PA 18360
Attorney for Debtor(s)

Frederick L. Reigle, Esquire
2901 St. Lawrence Avenue
P.O. Box 4010
Reading PA 19606
Trustee

Served Via 1st Class Mail:

Mark D. Schaeffer aka Mark Douglas Schaeffer aka Mark Schaeffer

Danielle Christa Schaeffer aka Danielle C. Schaeffer aka Danielle Schaeffer
521 Frutchey Hill Road
Easton , PA 18040
Debtor

POWERS KIRN & ASSOCIATES, LLC

By: **/s/ Jill Manuel-Coughlin, Esquire**

By: Jill Manuel-Coughlin

Attorney ID # 63252

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090

Facsimile: 215-942-8661

E-mail: Jill@pkallc.com

Attorney for Movant

DATED: March 30, 2018